

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS MOORER,)	
)	
Plaintiff,)	CASE NO.: 18 CV 3796
)	
v.)	
)	
CITY OF CHICAGO POLICE)	
OFFICERS M. PLATT, STAR NO. 577,)	Hon. Manish S. Shah
J. GONZALEZ, STAR NO. 20210, J.)	
CARDO, STAR NO. 21299, T.)	
MCDERMOTT, STAR NO. 21084, J.)	
FOLINO, STAR NO. 20143, M.)	
BENIGNO, STAR NO. 20807, F.)	
SZWEDO, STAR NO. 20813 and THE)	
CITY OF CHICAGO,)	
)	
Defendants.)	

JOINT STATUS REPORT

The Parties hereto file the following status report regarding discovery.

I. DISCOVERY PROCEEDINGS

At the status on March 6, 2020, the parties brought up discovery issues in connection with the following:

1. A supplemental deposition of Defendant McDermott. The parties have discussed and agree to do it remotely. Counsel for Defendant McDermott has indicated he will be able to produce the Defendant on June 9, 2020 or June 11, 2020.
2. Plaintiff had been trying to obtain service for depositions of two eyewitnesses (who have been difficult to locate) to the underlying crime. These efforts were put off in mid-March because Plaintiff was unsure how depositions were going to take place if at all at that time (e.g., whether they would somehow occur remotely or otherwise).

With the apparent consensus that depositions in all cases will be done remotely for the time being and assuming that Plaintiff can subpoena these witnesses to his office, Plaintiff presumes that he can sit them in a conference room with a laptop and proceed to do the deposition via zoom (assuming he can get them served).

3. There was a discovery production that Plaintiff had been seeking which was intended to discover who and at what time any CPD personnel (and the identification of that person) first obtained Plaintiff's mug shot that was used in the early morning hours for photo array lineups done on August 28, 2010. Plaintiff has not received the documents showing who accessed Plaintiff's mug shot that was used in the initial photo arrays of August 28, 2010. Defendants have tendered multiple documents showing dates and times of detectives who accessed records relating to Plaintiff. Defendants are running additional searches. If no more records exist relating to detectives who accessed records relating to Plaintiff, Defendants agree to produce a relevant 30(b)(6) witnesses, or submit a declaration, as ordered by this court. Because of issues related to the pandemic, (the police department's administrative staff is limited as officers usually detailed to the Office of Legal Affairs are currently detailed to assist in patrol, etc.), Defendants may need more time to work on searching for the requested documents.
4. Plaintiff owes Defendant McDermott supplemental answers to interrogatories which he will serve on or before Monday, May 11, 2020.

s/Edward M. Fox

ED FOX & ASSOCIATES, LTD.
300 W Adams St, Ste 330
Chicago, IL 60606
(312) 345-8877
efox@efoxlaw.com
Attorney for Plaintiff

/s/ Jordan F. Yurchich

City of Chicago Department of Law
30 N. LaSalle St. Ste 900
Chicago, Il. 60602
(312) 744-1625
Jordan.yurchich2@cityofchicago.org
One of the attorneys for the City of Chicago and Defendant Officers

s/Eric Palles

Daley Mohan Groble PC
55 W Monroe, Ste 1600
Chicago, IL 60603
(312) 422-9999
epalles@daleymohan.com
Attorney for T. McDermott